

Partners Dawn M. Cardi Chad L. Edgar

Associates Jessica Friedrich Joanna C. Kahan

Of counsel Nina Epstein Diane Ferrone

May 12, 2022

## Via ECF

Hon. Laura Taylor Swain United States District Court Judge Southern District of New York 500 Pearl Street New York, NY 10007

## MEMO ENDORSED

Re:

<u>United States v. Mircea Constantinescu, et al.</u>, 19-cr-651 (LTS)

Your Honor:

On behalf of defendants Iuliana Mihailescu, Ionela Constantinescu and Cristian Costea, with the consent of the government, we respectfully request a 60-day adjournment of the status conference scheduled for May 23, 2022 at 2:30 pm.

The parties do not have any issues to raise with the Court at the conference and continue to engage in discussions to resolve this matter.

Should the Court grant the instant request, the defendants consent to the exclusion of Speedy Trial time to the adjourn date.

Thank you for your consideration of this matter.

The foregoing adjournment request is granted. The pretrial conference is hereby rescheduled for August 2, 2022, at 2:30p.m. The Court finds pursuant to 18 USC section 3161(h)(7)(A) that the ends of justice served by an exclusion of the time, from speedy trial computations, from today's date through August 2, 2022, outweigh the best interests of the public and the defendant in a speedy trial in order to allow the parties to continue discussing potential pretrial dispositions. Dkt. no. 1076 resolved. SO ORDERED. 5/13/2022 /s/ Laura Taylor Swain, Chief USDJ

cc: All Parties (via ECF)

Respectfully submitted,

/s/

Dawn M. Cardi